



July 11, 2016

Reference No. 038443-111

Ms. Leslie Patterson
Remedial Project Manager
United States Environmental Protection Agency
Region V
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Mail Code SR-6J
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60604

Ms. Madelyn Adams
Environmental Response and Revitalization
Ohio Environmental Protection Agency
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Mr. Steve Renninger
On-Scene Coordinator
U.S. EPA Region V
Emergency Response Branch
26 West Martin Luther King Drive
Cincinnati, Ohio
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Dear Ms. Patterson, Ms. Adams, and Mr. Renninger:

**Re: Progress Report: June 1 through 30, 2016
South Dayton Dump and Landfill Site, Moraine, Ohio (Site)**

This Monthly Progress Report is submitted in accordance with the Administrative Settlement and Order on Consent (ASAO) for Remedial Investigation/Feasibility Study (RI/FS) Proceeding Under Sections 104, 107, and 122 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. §§ 9604, 9607, and 9622 (United States Environmental Protection Agency [USEPA] Docket No. V-W-16-C-011) effective June 11, 2016 (RI/FS ASAO), and the ASAO for Removal Action Proceeding Under Sections 104, 106(a), 107, and 122 of the CERCLA, 42 U.S.C. §§ 9604, 9606(a), 9607, and 9622 USEPA Docket No. V-W-13-C-010, effective April 8, 2013 (Removal Action ASAO), for the period of June 1 through 30, 2016.

The next Progress Report for the month of July 2016 will be submitted on or before August 10, 2016.

Significant Developments in this Reporting Period

RI/FS ASAOC Developments

The ASAOC for Remedial Investigation/Feasibility Study Proceeding Under Sections 104, 107, and 122 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. §§ 9604, 9607, and 9622 (United States Environmental Protection Agency [USEPA]) Docket No. V-W-16-C-011) became effective on June 11, 2016.

The Respondents provided USEPA with a letter dated June 20, 2016, notifying USEPA that GHD Services (formerly CRA) was selected as the primary environmental consultant (Contractor) for the South Dayton Dump and Landfill and that Mr. Julian Hayward of GHD was designated as the Project Coordinator responsible for administration of all action by Respondents required by the ASAOC. On June 22, 2016, USEPA approved the appointment of GHD Services as the Contractor and Mr. Julian Hayward of GHD as the Project Coordinator.

Removal Action ASAOC Developments

On June 14, 2016, GHD informed USEPA that annual proficiency sampling and 60-day post SSDS-modification sampling for Building 12 (Overstreet Painting and S&J Precision), Building 14 (NexGen Vending), and Building 15 (SIM Trainer) would be completed in a single event over a three day period beginning on June 15, 2016.

From June 15 to 17, 2016, GHD completed annual proficiency sampling and 60-day post SSDS-modification sampling in a single event for Building 12 (Overstreet Painting and S&J Precision), Building 14 (NexGen Vending), and Building 15 (SIM Trainer). Analytical results are due in July 2016.

The status for each building requiring mitigation, as of June 30, 2016, is summarized in Attachment A.

Summaries of all Anticipated Problems and Planned Resolutions

No problems were encountered during the reporting month and none are currently anticipated.

Projected Work for the Next Reporting Period

- The Respondents and USEPA On-Scene Coordinator will continue to work together to discuss VI mitigation measures and implement the mitigation work plan.
- Preparation and submittal of the RI/FS Work Plan (including Field Sampling Plan, Quality Assurance Project Plan, and Health & Safety Plan) to USEPA.
- Negotiating Site Access Agreements with landowners and tenants whose properties currently reside within or adjacent to the Site.
- Complete semi-annual methane monitoring at GP-2 and corresponding Site landfill gas probes.

Should you have any questions on the above, please do not hesitate to contact us.

Sincerely,

GHD



Julian Hayward

BR/cb/1

Encl.

cc: (all by pdf)	Wendell Barner, Barner Consulting	Steve Quigley, GHD
	Tim Hoffman, Dinsmore & Shohl	Brett Fishwild, CH2M Hill
	Robin Lunn, Neal, Gerber & Eisenberg	Ken Brown, ITW
	Bryan Heath, NCR	Jim Campbell, EMI
	Scott Blackhurst, Kelsey Hayes Company	Wray Blattner, Thompson Hine
	Valerie Chan, GHD	

Summary of Building Status

As of June 30, 2016, the status of each building requiring mitigation was as follows:

Building 8 (B&G Trucking):

- 30-day proficiency sampling completed on September 12, 2013, with additional confirmatory sampling completed on January 9, 2014 and March 10, 2014.
- 2015 indoor air (IA) and/or SS soil vapor sampling were completed on February 17, 2015, July 15, 2015, and October 6, 2015:
 - Trichloroethene concentration in SS soil vapor samples collected from probes SS-8-A and SS-8-B were greater than ODH screening level (AF of 33). GHD suspects a localized TCE source under the building may be contributing to elevated TCE concentrations in the SS soil vapor.
 - Benzene concentrations from IA locations IA-8-A and IA-8-D were less than ODH screening levels. Benzene concentration from IA location IA-8-F was greater than the ODH screening level in the July 2015 sampling round. Available evidence suggests IA benzene concentrations are the result of ongoing daily human activities within and around Building 8 as well as IA background sources, and are not the result of a complete VI pathway.
 - The fan at extraction point EP-3 was not operating during the majority of the July 2015 sampling round and was replaced late in the day on July 15, 2015.
 - The fans at extraction points EP-1 and EP-2 were not operating on September 29, 2015 and were replaced on October 1, 2015.
 - All fans were operational during the October 2015 sampling round.
- SSDS modifications including EP-3 and EP-5 stemline installations were completed on February 5, 2016.
- 60-day post-SSDS modification sampling was completed at Building 8 (B&G Equipment & Truck Repair) on April 13, 2016:
 - Analytical results show significant decreases in SS concentrations.
 - Concentrations at SS-8-B and SS-8-D are less than ODH Screening Levels. SS concentrations of TCE at SS-8-A remain greater than ODH Screening Levels.
 - USEPA proposed sub-slab stemline piping additions to SS-8-A to further target this location. GHD and Respondents will discuss the proposal for sub-slab stemline piping additions in Building 8.

Building 9 (B&G Trucking):

- 30-day and 180-day proficiency sampling completed on October 24, 2013 and March 10, 2014, respectively, with additional 180-day confirmatory sampling completed on May 20, 2014.

- Two rounds of 2015 IA and SS soil vapor sampling completed on February 17, 2015, and July 15, 2015:
 - TCE concentrations in samples collected from SS soil vapor probe SS-9-A remain greater than ODH screening levels. GHD suspects a localized TCE source under the building may be contributing to elevated TCE concentrations in SS soil vapor.
 - Benzene and xylenes were not detected in Building 9 during the July 2015 sampling round.
- SSDS modifications including EP-2 stemline installation and EP-3 installation were completed on February 5, 2016.
- 60-day post-SSDS modification sampling was completed at Building 9 (B&G Equipment & Truck Repair) on April 13, 2016.
 - Analytical results show significant decreases SS concentrations. However, SS concentrations of TCE at SS-9-A remain greater than ODH Screening Levels.
 - USEPA proposed sub-slab stemline piping additions to SS-8-A to further target this location. GHD and Respondents will discuss the proposal for sub-slab stemline piping additions in Building 9.

Building 12 (Overstreet Painting and S&J Precision):

- 30-day proficiency sampling completed on October 24, 2013. A corrective action was implemented on March 6, 2014 and additional confirmatory sampling was completed on April 2 and 3, 2014.
- Two rounds of 2015 IA and SS soil vapor sampling completed on February 18, 2015 and July 13, 2015:
 - TCE concentrations in SS soil vapor samples remain greater than ODH screening and action levels. GHD suspects a localized TCE source under the building may be contributing to elevated TCE concentrations in SS soil vapor.
 - cis-1,2-Dichloroethene (cis-1,2-DCE) concentrations in SS soil vapor samples have decreased to less than the ODH screening level.
 - Benzene remains present in IA samples at concentrations greater than ODH screening levels; however, based on available data, the benzene concentrations in indoor air are a result of ongoing daily human activities within and around Building 12, and are not the result of a complete VI pathway.
- Respondents and USEPA proposed SSDS modifications to the building owner and tenants during the January 28, 2016 meeting.
- SSDS modifications at Building 12 (Overstreet Painting and S&J Precision) began on April 4, 2016 and were completed by April 13, 2016.
- 60-day post-SSDS modification sampling and annual proficiency sampling were completed at Building 12 (Overstreet Painting and S&J Precision) in one joint event on June 15 and 16, 2016, respectively. Analytical results are due in July 2016.

Building 14 (NexGen Vending):

- 30-day proficiency sampling completed on January 16, 2014 and 180-day proficiency sampling completed on June 3, 2014.
- Two rounds of 2015 IA and SS soil vapor sampling completed on February 19, 2015 and July 16, 2015.
- The building is in compliance; IA and SS concentrations are less than ODH screening levels.
- A proposed SSDS modification (addition of an extraction point) was agreed upon during the January 28, 2016 meeting.
- SSDS modifications at Building 14 (NexGen Vending) were completed on April 6, 2016.
- 60-day post-SSDS modification sampling and annual proficiency sampling were completed at Building 14 (NexGen Vending) in one joint event on June 15, 2016. Analytical results are due in July 2016.

Building 15 (SIM Trainer):

- 30-day proficiency sampling completed on February 13, 2014. A corrective action was implemented on April 6, 2014 and additional confirmatory sampling was completed on April 24, 2014.
- Two rounds of 2015 IA and SS soil vapor sampling completed on February 18, 2015 and July 14, 2015.
- July 2015 TCE SS concentration at SS-15-C was greater than the ODH SS screening level (AF of 33).
- IA concentrations are less than ODH IA screening levels.
- Respondents and USEPA proposed SSDS modifications to the building owner during the January 28, 2016 meeting.
- SSDS modifications at Building 15 (SIM Trainer) were completed on April 6, 2016.
- 60-day post-SSDS modification sampling and annual proficiency sampling were completed at Building 15 (SIM Trainer) in one joint event on June 17, 2016. Analytical results are due in July 2016.

Building 17 (Megacity Construction):

- 30-day and 180-day proficiency sampling completed on January 16, 2014, and June 3, 2014, respectively.
- 1-year proficiency sampling completed on February 19, 2015.
- Annual proficiency sampling was completed on February 10, 2016.
- The building is in compliance.

Building 24 (Globe Equipment):

- 30-day, 180-day, and 1-year proficiency sampling completed on September 11, 2013, February 7, 2014, and December 5, 2014 respectively.
- One-year confirmatory sampling completed on February 20, 2015.
- Additional confirmatory sampling completed on July 16, 2015.
- SSDS modifications for Globe Equipment were completed on February 13, 2016.

- Annual proficiency sampling was completed on February 11, 2016.
- The building is in compliance; IA and SS concentrations are less than ODH screening levels:
 - The sub-slab sample result for SS-24-B was greater than the ODH screening level (AF=10) but less than the secondary screening level (AF=33).